

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

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NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**NAACP PLAINTIFFS' OBJECTIONS AND COUNTER-DESIGNATIONS**  
**IN RESPONSE TO LEGISLATIVE DEFENDANTS' DEPOSITION**  
**DESIGNATIONS**

Pursuant to the parties' agreement and the Court's June 4, 2025 Order on Plaintiffs' Motion to Clarify or Modify Allotted Trial Time (Dkt. 135), NAACP Plaintiffs, by counsel, respectfully submit the attached objections and counter-designations in response to

Legislative Defendants' July 17, 2025 deposition designations for the deposition of Representative Mary Price Harrison (Dkt. 159). Attached hereto as **Exhibit A** is chart identifying NAACP Plaintiffs' objections and counter-designations. Attached hereto as **Exhibit B** is a true and correct copy of Legislative Defendants' Notice of Filing of Deposition Designations, Exhibit 1 (Dkt. 159-1), with Legislative Defendants' designations highlighted in yellow and NAACP Plaintiffs' counter-designations highlighted in pink.

NAACP Plaintiffs also object to the admissibility of several documents used during Representative Harrison's deposition and respectfully refer the Court to Plaintiffs' previously filed Objections to Legislative Defendants' 5.16.25 Exhibit List for further detail. (See Dkt. 132, at 18-19 (objections to exhibit nos. LDTX200, LDTX202-LDTX207)).

Dated: July 22, 2025

Respectfully submitted,

/s/ Hilary Harris Klein

Hilary Harris Klein

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\*Appearing in this matter by Special  
Appearance pursuant to L-R 83.1(d)

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### **CERTIFICATE OF SERVICE**

I certify that on July 22, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

*/s/ Hilary Harris Klein*

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Hilary Harris Klein